

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

INNOBRILLIANCE, LLC,

Plaintiff

v.

SONY CORPORATION

Defendant

Case No. 6:21-cv-00094

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff InnoBrilliance, LLC (“InnoBrilliance” or “Plaintiff”) files this Complaint for patent infringement against Sony Corporation (“Defendant”), and alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under 35 U.S.C. § 1 et seq.

PARTIES

2. InnoBrilliance is a limited liability company organized and existing under the laws of the State of Texas with its principal place of business in Waco, Texas.

3. Upon information and belief, Sony Corporation is a foreign corporation organized and existing under the laws of Japan with its principal place of business at 1-7-1 Konan, Minato-Ku, Tokyo, Japan.

JURISDICTION AND VENUE

4. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Defendant because, among other things, Sony has committed, aided, abetted, contributed to and/or participated in the commission of patent infringement in violation of 35 U.S.C. § 271 in this judicial district and elsewhere that led to harm and injury to Plaintiff.

6. Venue is proper in this District under 28 U.S.C. § 1400 because Defendant has committed acts of infringement and has regular and established places of business in this judicial district.

OVERVIEW OF THE ACCUSED PRODUCT

7. Defendant has marketed, sold, distributed, and provided for its customers the Sony PlayStation Vue Multiview software system for use with PlayStation devices and Apple TV devices (the “Accused Product”)

8. The following illustrates usage, functions, and operation of the Accused Product:



Watch up to three live channels — all on one screen.



Dan Myers
Head of Product, PlayStation Vue

Update: even more good news! The real-time sports score feature for PS Vue launches on PS4 today — check it out during the NBA playoffs. You can turn the feature on/off in the Settings menu. The real-time sports score feature is also available on Amazon Fire TV and Android TV devices.

We've got some great news for sports fans and TV lovers.

Today, we're launching a new multi-view feature for [PlayStation Vue](#) that allows you to watch up to three live channels — all on one screen. With March Madness starting next week, this will be a great way to catch several live games at once from TNT, TBS, TruTV and CBS.* You can also use this feature for any live TV channel available on Vue, such as watching a mix of live news programs or live events at once.

Multi-view will be available on PS4 starting today. The new feature gives you the option to watch and listen to a main TV channel and view up to two additional channels at the same time. Keep an eye on all the action and enjoy mixing and matching your favorite channels.

To use this feature, just press and hold X on any live TV program from the Guide or Live TV row of the home screen to open up the selection screen for multi-view. A menu will pop up to give you an option of using either two or three multi-view screens. You can select any other live programming from the Live TV strand and start viewing multiple programs at once. The main screen in multi-view will contain audio of the programming.

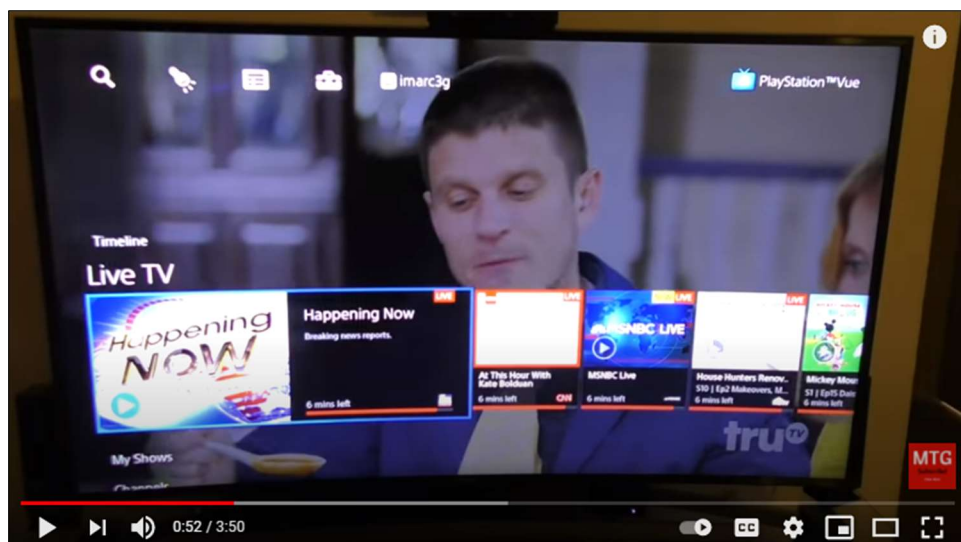
Press X to start any program. Press and hold X on any live program to start a multi-screen viewing experience.

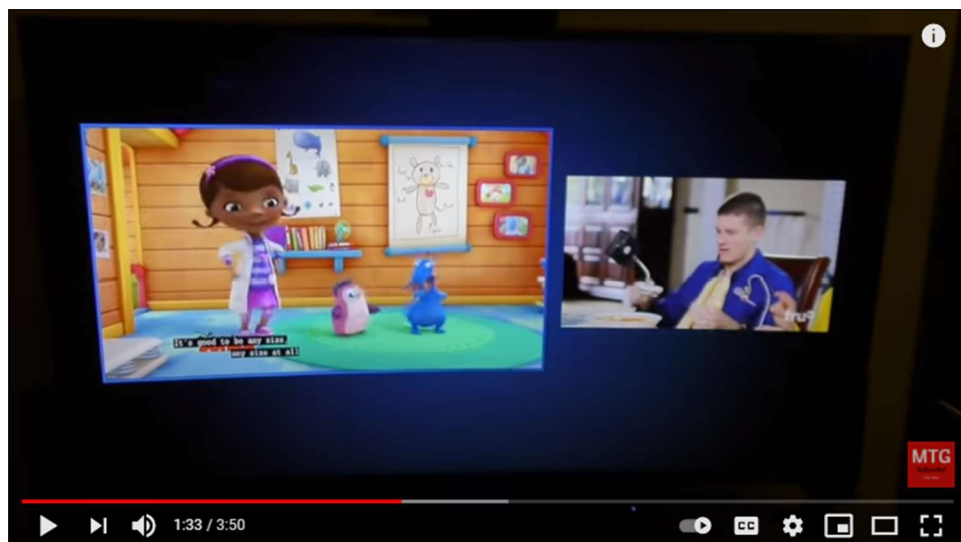
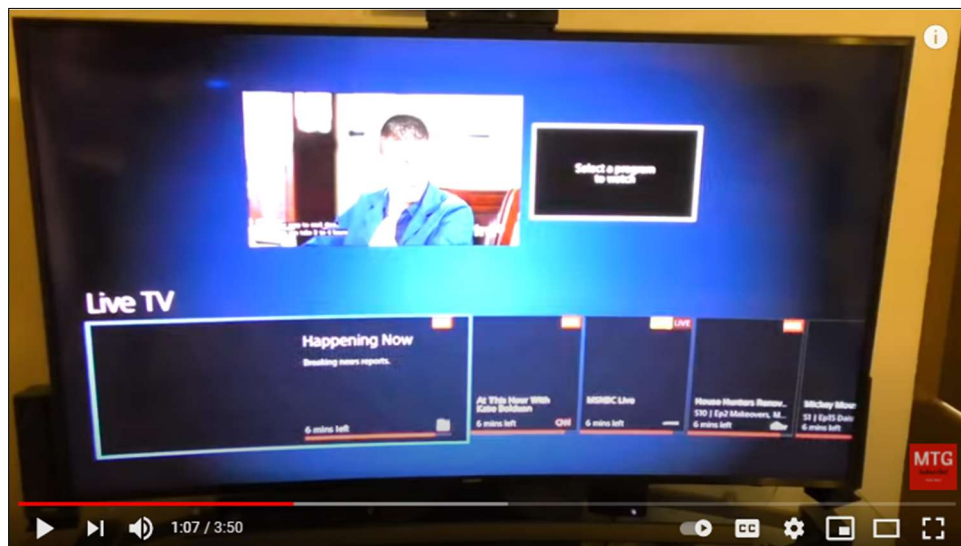
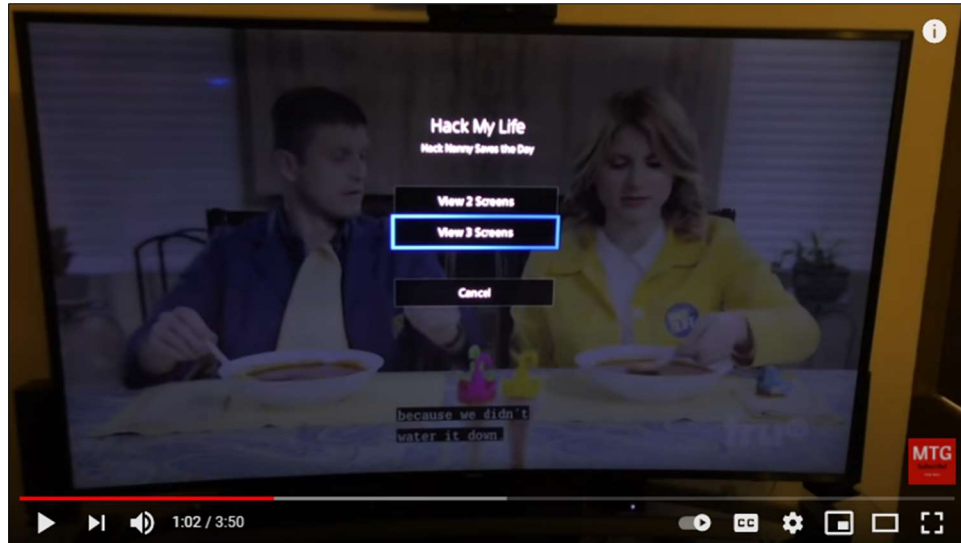
If you want to switch programs within the multi-view screen, press Square on your DualShock 4. To move a program to the main screen, just highlight the smaller screen and press Square.

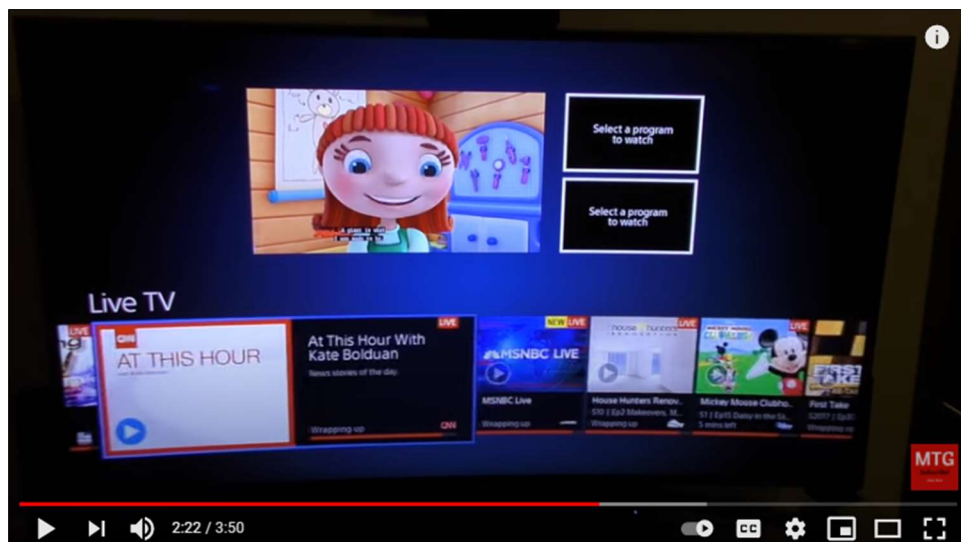
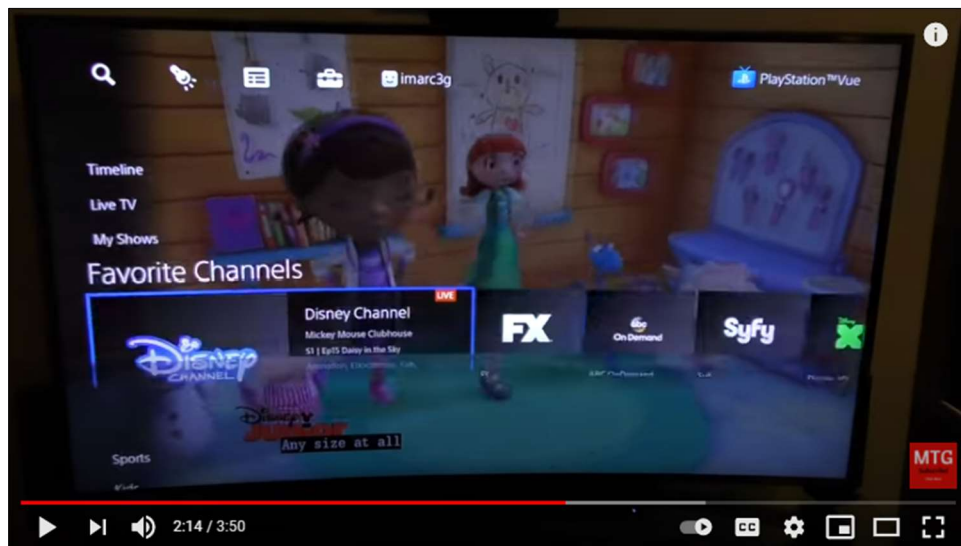
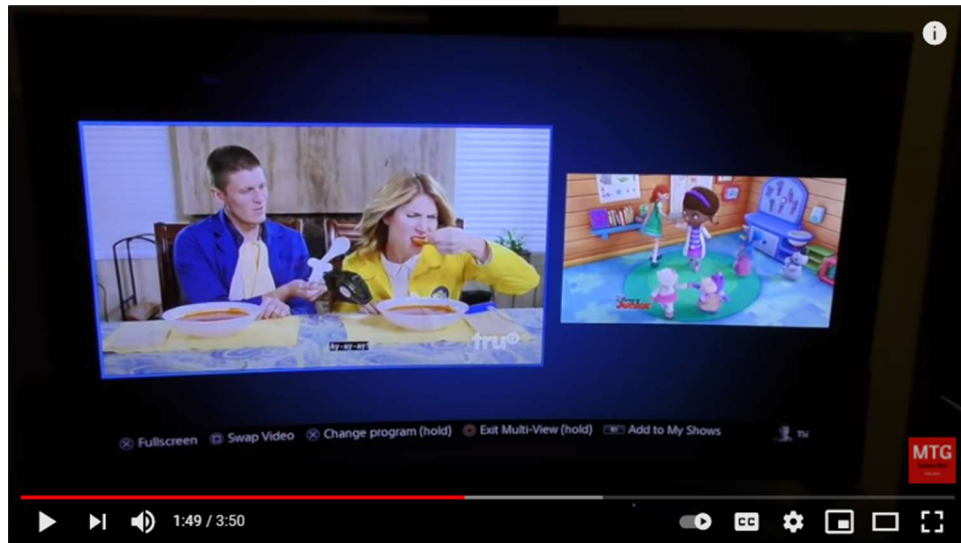
Our team is currently hard at work to bring even more new features to PS Vue. Coming soon, real-time sports scores will be added to help you know the games to watch. You can also turn off spoiler alerts if you are waiting to watch the big game. Stay tuned for more information on the additional sports features we're adding to PS Vue.

We're pleased to bring you more new innovative features and we hope you enjoy multi-view during the tournament on PS Vue today — just in time for March Madness. Give it a try, and let us know what you think.

<https://blog.playstation.com/2017/03/06/ps-vue-watch-multiple-channels-at-once-with-multi-view-out-today-on-ps4/>









<https://www.youtube.com/watch?app=desktop&v=qJuFQkD4Xj0>

How to Use the PlayStation Multi-View Feature on Apple TV

By [Brian Burgess](#)

Last Updated on March 20, 2019



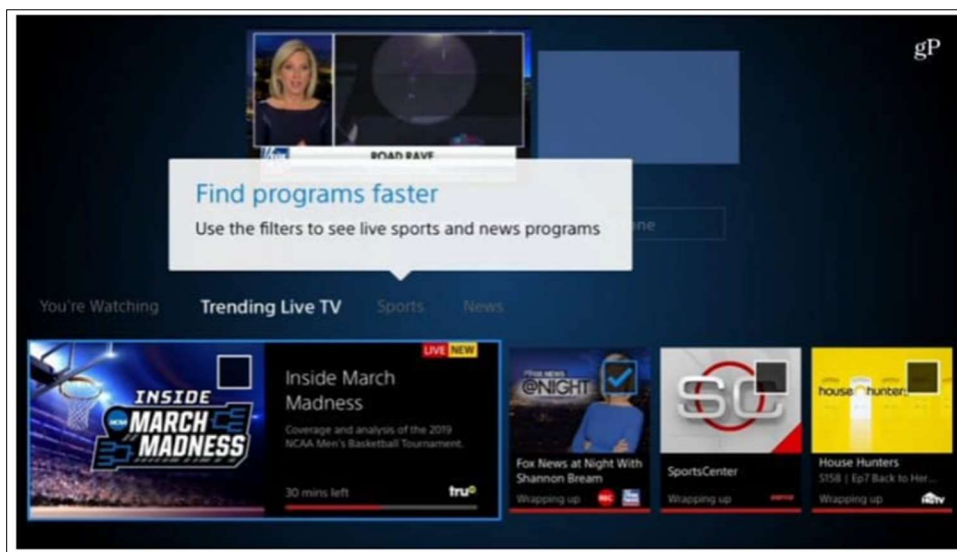
This week PlayStation Vue **announced** that it was updating its Apple TV app to support a new "Multi-View" feature. Previously only available on PS4 (and only three screens), this new feature allows you to watch up to four screens at the same time. Here is a look at how to enable and navigate the new feature on your Apple TV and watch multiple channels at once. If you are a **cord cutter** and use PSVue, this is a welcome new feature.

PlayStation Vue Multi-View on Apple TV

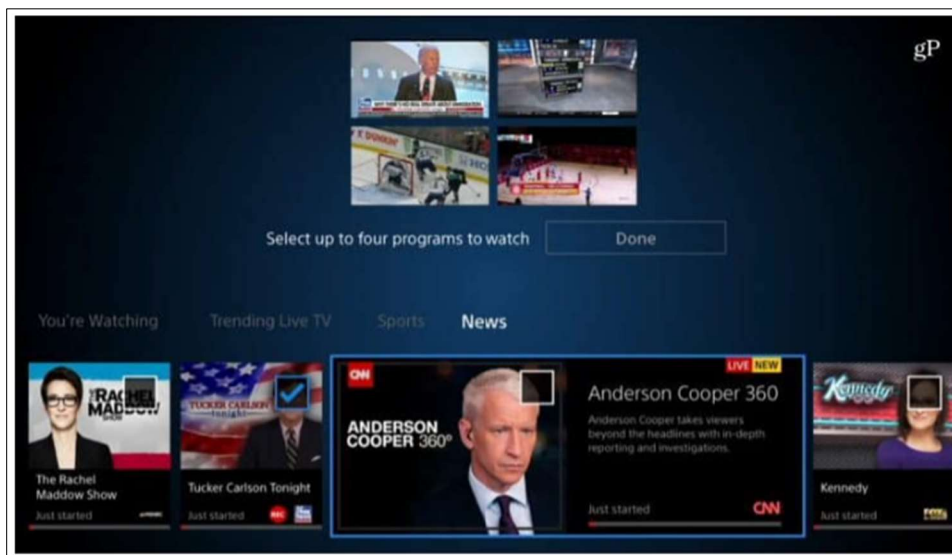
Launch **PlayStation Vue** on your Apple TV and while you're watching a live TV program, swipe down on the Apple TV remote. There you will see a new "Multi-View" tab. Highlight it and then select the "Watch in Multi-View" option. Note that you need to be watching **live** TV – it won't work if you're watching programs from DVR.



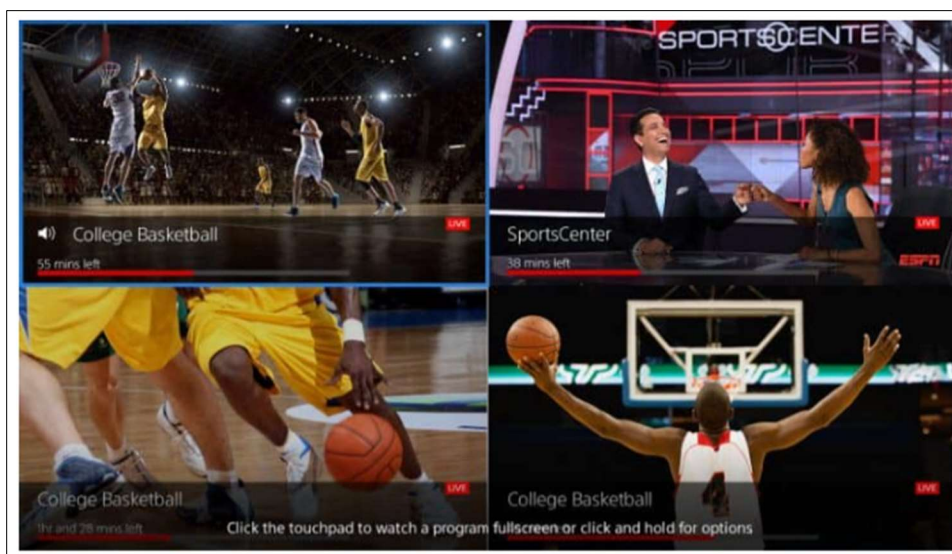
Next, you can start selecting the other channels (up to four) that you want to add to the multi-view. While you can choose any channel, to make things easier, it allows you to filter shows by Sports and News. This comes in handy while watching major news events or multiple sporting events.



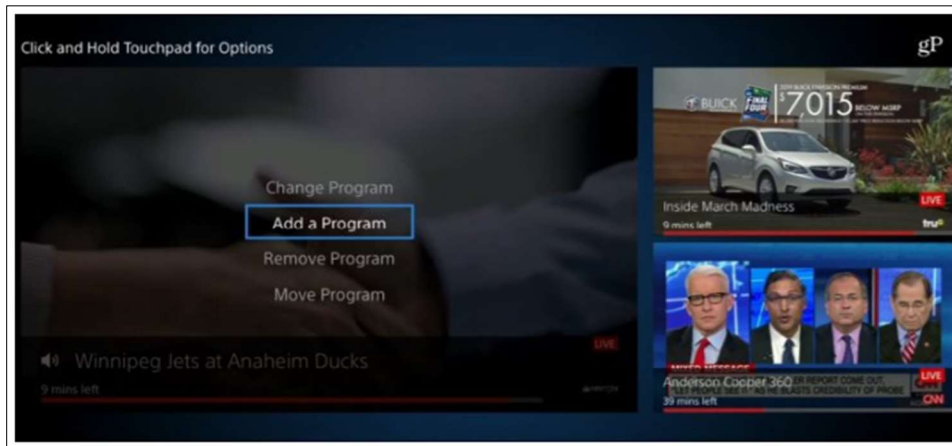
Scroll through and select the channel you want to add to the multi-view. Each channel you select will be added as a thumbnail at the top of the screen. When you're finished choosing your channels, select the "Done" button.



Once you have four screens showing, you can simply swipe over to the one you want to enlarge and select it. If you want to go back to the channels you had showing in the multi-view mode, hit the "Menu" button on your Apple TV remote. Hit the "Menu" button again to go back to the screen where you can choose filter through and select different channels.



You can also click and hold the touchpad on the remote to get additional options including: "Change Program", "Add Program", "Remove Program", and "Move Program".



You don't have to choose four programs either, you can choose two or three. For example, in the shot below I choose three different channels.



If you're a **PlayStation Vue** subscriber and watch it on Apple TV, you will really enjoy this new feature. It will allow you to follow multiple games or news programs at the same time. It's not just for new and sports either, you can use it to watch any of the channels included in your PlayStation Vue subscription.

Of course, PlayStation Vue is one of several OTT live streaming TV services for people out there who have decided to cut the cord. For more on getting rid of your cable or satellite subscription, read our comprehensive **Guide to Cord Cutting**.

<https://www.groovypost.com/howto/playstation-multi-view-feature-on-apple-tv/>

9. Whenever the Accused Product was used, by itself, its customers, or other users of the system, the Defendant controlled the operation and use of the Accused Product

COUNT I
(Infringement of U.S. Patent No. 8,925,010)

10. InnoBrilliance incorporates the above paragraphs as though fully set forth herein.

11. Plaintiff is the owner, by assignment, of U.S. Patent No. 8,925,010 (the “’010 Patent”), entitled METHOD AND SYSTEM FOR TELEVISION CHANNEL GROUP, which issued on December 30, 2014. A copy of the ’010 Patent is attached as Exhibit PX-010.

12. The ’010 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. Defendant has been and is now infringing one or more claims of the ’010 Patent under 35 U.S.C. § 271 by making and using the Accused Product in the United States without authority.

14. Defendant has also infringed the ’010 Patent by encouraging users of the Accused Product to use the Accused Product to practice at least one of the claims of the ’010 Patent. Defendant has notice of the ’010 Patent at least as of the date of service of this complaint.

15. Claim 1 recites:

1. A television system comprising:

an input interface for receiving video data from a plurality of

video streams and transferring the video data to a frame controller in communication with a television display;

the frame controller causing the video data from each of the plurality of different video streams to be displayed in a separate frame on the television display, each frame occupying an area of the television display separate from an area occupied by any other frame, and at least two of the frames being of different sizes;

the frame controller for receiving a user selection of a channel group comprising a plurality of channels, each channel of the channel group comprising at least one serially-available video stream sharing at least one common attribute;

in response to the user selection, the frame controller further causing display of two or more channels of the channel group, each fully contained within one of the separate frames on the television display;

the frame controller further receiving a user instruction to change the display in a given frame on the television display to a given channel of the channel group, wherein the given channel is not currently displayed on the television display;

and

in response to the user instruction, the frame controller further causing the display of the given channel in the given frame.

16. Defendant infringes at least claim 1 of the '010 Patent.

17. The Accused Product is a television system.

18. The Accused Product includes an input interface for receiving video data from a plurality of video streams and transferring the video data to a frame controller in communication with a television display.

19. The Accused Product includes a frame controller that causes the video data from each of the plurality of different video streams to be displayed in a separate frame on the television display, each frame occupying an area of the television display separate from an area occupied by any other frame, and at least two of the frames being of different sizes.

20. The Accused Product includes a frame controller for receiving a user selection of a channel group comprising a plurality of channels, each channel of the channel group comprising at least one serially-available video stream sharing at least one common attribute.

21. The Accused Product includes a frame controller that causes a display of two or more channels of the channel group, each fully contained within one of the separate frames on the television display.

22. The Accused Product includes a frame controller that receives a user instruction to change the display in a given frame on the television display to a given

channel of the channel group, wherein the given channel is not currently displayed on the television display.

23. The Accused Product includes a frame controller that causes the display of the given channel in the given frame.

24. InnoBrilliance has been damaged by Defendant's infringing activities.

COUNT II
(Infringement of U.S. Patent No. 9,247,299)

25. InnoBrilliance incorporates the above paragraphs as though fully set forth herein.

26. Plaintiff is the owner, by assignment, of U.S. Patent No. 9,247,299 (the "299 Patent"), entitled METHOD AND SYSTEM FOR TELEVISION CHANNEL GROUP, which issued on January 26, 2016. A copy of the '299 Patent is attached as Exhibit PX-299.

27. The '299 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

28. Defendant has been and is now infringing one or more claims of the '299 Patent under 35 U.S.C. § 271 by making and using the Accused Product in the United States without authority.

29. Defendant has also infringed the '299 Patent by encouraging users of the Accused Product to use the Accused Product to practice the claims of the '299 Patent. Defendant has notice of the '299 Patent at least as of the date of service of this complaint.

30. Claim 1 recites:

1. A television system, comprising:
 - an input interface for receiving video data from a plurality of video streams; and
 - a frame controller causing the video data to be displayed in a plurality of pictures on a display coupled to the television system, each picture occupying an area of the display separate from an area occupied by any other picture, the frame controller further:
 - receives a first user selection to display a video group related to an attribute, the video group comprising at least a first video stream and a second video stream of the plurality of video streams;
 - receives the first and the second video streams of the video group from the input interface;
 - displays the first and the second video streams in a first picture and a second picture of the plurality of pictures;
 - receives a second user selection to change the display in a given picture of the plurality of pictures to a given video stream of the video group, wherein the given video stream is not currently displayed on the display; and
 - displays the given video stream in the given picture.

31. Defendant infringes at least claim 1 of the '299 Patent.

32. The Accused Product is a television system.

33. The Accused Product includes an input interface for receiving video data from a plurality of video streams.

34. The Accused Product includes a frame controller that causes the video data to be displayed in a plurality of pictures on a display coupled to the television system, each picture occupying an area of the display separate from an area occupied by any other picture, the frame controller further.

35. The Accused Product receives a first user selection to display a video group related to an attribute, the video group comprising at least a first video stream and a second video stream of the plurality of video streams.

36. The Accused Product receives the first and the second video streams of the video group from the input interface.

37. The Accused Product displays the first and the second video streams in a first picture and a second picture of the plurality of pictures.

38. The Accused Product receives a second user selection to change the display in a given picture of the plurality of pictures to a given video stream of the video group, wherein the given video stream is not currently displayed on the display.

39. The Accused Product displays the given video stream in the given picture.

40. InnoBrilliance has been damaged by Defendant's infringing activities.

COUNT III
(Infringement of U.S. Patent No. 9,319,619)

41. InnoBrilliance incorporates the above paragraphs as though fully set forth herein.

42. Plaintiff is the owner, by assignment, of U.S. Patent No. 9,319,619 (the “’619 Patent”), entitled METHOD AND SYSTEM FOR PRESENTING MULTIPLE PICTURES ON A TELEVISION, which issued on April 19, 2016. A copy of the ’619 Patent is attached as Exhibit PX-619.

43. The ’619 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

44. Defendant has been and is now infringing one or more claims of the ’619 Patent under 35 U.S.C. § 271 by making and using the Accused Product in the United States without authority.

45. Defendant has also infringed the ’619 Patent by encouraging users of the Accused Product to use the Accused Product to practice the claims of the ’619 Patent. Defendant has notice of the ’619 Patent at least as of the date of service of this complaint.

46. Claim 1 recites:

1. A television system, comprising:
 - a first input interface for receiving a plurality of video streams
 - and for transferring the plurality of video streams to a frame controller, wherein each of the plurality of video streams correspond to a different video channel;

a second input interface for receiving a command from a control device;

the frame controller causing each of the plurality of received video streams to be simultaneously displayed in corresponding separate, non-overlapping frames on a display, each frame occupying an area of the display separate from an area occupied by any other frame, wherein the non-overlapping frames comprise at least:

a first frame displaying a first video stream, wherein the displaying of the first video stream comprises displaying first video data and playing first audio data of the first video stream;

a second frame smaller in size than the first frame, the second frame displaying a second video stream different from the first video stream, wherein the displaying of the second video stream comprises displaying second video data of the second video stream and not playing second audio data of the second video stream; and

a third frame smaller in size than the first frame, the third frame displaying a third video stream different from the first and second video streams, wherein the displaying of the third video stream comprises displaying third video data of the

third video stream and not playing third audio data of the third video stream; and

the frame controller further, based on the command, causing the display of the first and second video streams in the first and second frames to be modified, wherein the modified display of the first video stream comprises displaying the first video data of the first video stream in the second frame and not playing the first audio data of the first video stream, wherein the modified display of the second video stream comprises displaying the second video data in the first frame and playing the second audio data of the second video stream.

47. More particularly, Defendant infringes at least claim 1 of the '619 Patent.

48. The Accused Product is a television system.

49. The Accused Product includes a first input interface for receiving a plurality of video streams and for transferring the plurality of video streams to a frame controller, wherein each of the plurality of video streams correspond to a different video channel.

50. The Accused Product includes a second input interface for receiving a command from a control device.

51. The Accused Product includes a frame controller that causes each of the plurality of received video streams to be simultaneously displayed in corresponding separate, non-overlapping frames on a display, each frame occupying an area of the display separate from an area occupied by any other frame.

52. The non-overlapping frames include at least a first frame displaying a first video stream, wherein the displaying of the first video stream comprises displaying first video data and playing first audio data of the first video stream, a second frame smaller in size than the first frame, the second frame displaying a second video stream different from the first video stream, wherein the displaying of the second video stream comprises displaying second video data of the second video stream and not playing second audio data of the second video stream, and a third frame smaller in size than the first frame, the third frame displaying a third video stream different from the first and second video streams, wherein the displaying of the third video stream comprises displaying third video data of the third video stream and not playing third audio data of the third video stream.

53. The Accused Product includes a frame controller further that causes the display of the first and second video streams in the first and second frames to be modified, wherein the modified display of the first video stream comprises displaying the first video data of the first video stream in the second frame and not playing the first audio data of the first video stream, wherein the modified display of the second video stream comprises displaying the second video data in the first frame and playing the second audio data of the second video stream.

54. InnoBrilliance has been damaged by Defendant's infringing activities.

COUNT IV
(Infringement of U.S. Patent No. 10,148,902)

55. InnoBrilliance incorporates the above paragraphs as though fully set forth herein.

56. Plaintiff is the owner, by assignment, of U.S. Patent No. 10,148,902 (the "902 Patent"), entitled METHOD AND SYSTEM FOR PRESENTING MULTIPLE PICTURES ON A TELEVISION, which issued on December 4, 2018. A copy of the '902 Patent is attached as Exhibit PX-902.

57. The '902 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

58. Defendant has been and is now infringing one or more claims of the '902 Patent under 35 U.S.C. § 271 by making and using the Accused Product in the United States without authority.

59. Defendant has also infringed the '902 Patent by encouraging users of the Accused Product to use the Accused Product to practice the claims of the '902 Patent. Defendant has notice of the '902 Patent at least as of the date of service of this complaint.

60. Claim 1 recites:

1. A television system, comprising:

at least a first input interface configured to receive a plurality of

video streams from a plurality of video sources, wherein

the plurality of video streams comprises a first video

stream from a first video source of the plurality of video sources, a second video stream from a second video source of the plurality of video sources, and a third video stream from a third video source of the plurality of video sources, wherein the first video stream, the second video stream, and the third video stream are communicated via a common path;

a second input interface configured to receive a change command from a control device;

a frame controller configured to cause each of the first video stream, the second video stream, and the third video stream to be concurrently displayed in corresponding separate, non-overlapping frames on a display, each frame occupying an area of the display separate from an area occupied by any other frame, wherein the non-overlapping frames comprise at least:

a first frame configured to display the first video stream from the first video source;

a second frame different in size than the first frame, the second frame configured to display the second video stream from the second video source; and

a third frame different in size than the first frame, the third frame

configured to display the third video stream from the third video source; and

wherein the frame controller is further configured, based on the change command, to:

select the second frame and a fourth video stream from a fourth video source of the plurality of video sources, wherein the fourth video stream is not displayed via the display at a time of receipt of the change command; and

cause the fourth video stream to be displayed in the second frame.

61. More particularly, Defendant infringes at least claim 12 of the '902 Patent.

62. The Accused Product is a television system.

63. The Accused Product includes a first input interface configured to receive a plurality of video streams from a plurality of video sources, wherein the plurality of video streams comprises a first video stream from a first video source of the plurality of video sources, a second video stream from a second video source of the plurality of video sources, and a third video stream from a third video source of the plurality of video sources, wherein the first video stream, the second video stream, and the third video stream are communicated via a common path.

64. The Accused Product includes a second input interface configured to receive a change command from a control device.

65. The Accused Product includes a frame controller configured to cause each of the first video stream, the second video stream, and the third video stream to be concurrently displayed in corresponding separate, non-overlapping frames on a display, each frame occupying an area of the display separate from an area occupied by any other frame.

66. The non-overlapping frames include a first frame configured to display the first video stream from the first video source, a second frame different in size than the first frame, the second frame configured to display the second video stream from the second video source, and a third frame different in size than the first frame, the third frame configured to display the third video stream from the third video source.

67. The Accused Product includes a frame controller that is configured to select the second frame and a fourth video stream from a fourth video source of the plurality of video sources, wherein the fourth video stream is not displayed via the display at a time of receipt of the change command and cause the fourth video stream to be displayed in the second frame.

68. InnoBrilliance has been damaged by Defendant's infringing activities.

COUNT V
(Infringement of U.S. Patent No. 10,623,681)

69. InnoBrilliance incorporates the above paragraphs as though fully set forth herein.

70. Plaintiff is the owner, by assignment, of U.S. Patent No. 10,623,681 (the "681 Patent"), entitled METHOD AND SYSTEM FOR PRESENTING MULTIPLE

PICTURES ON A TELEVISION, which issued on April 14, 2020. A copy of the '681 Patent is attached as Exhibit PX-681.

71. The '681 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

72. Defendant has been and is now infringing one or more claims of the '681 Patent under 35 U.S.C. § 271 by making and using the Accused Product in the United States without authority.

73. Defendant has also infringed the '681 Patent by encouraging users of the Accused Product to use the Accused Product to practice the claims of the '681 Patent. Defendant has notice of the '681 Patent at least as of the date of service of this complaint.

74. Claim 1 recites:

1. A device comprising:

an input interface configured to receive a plurality of video streams and to provide the plurality of video streams to a frame controller, wherein each video stream of the plurality of video streams corresponds to a video channel of a plurality of video channels;

the frame controller configured to generate a first frame signal including:

a first subframe signal corresponding to a first video stream of the plurality of video streams;

a second subframe signal corresponding to a second video stream of the plurality of video streams; and

a third subframe signal corresponding to a third video stream of the plurality of video streams;

an output interface configured to output the first frame signal to a display, wherein the first frame signal is configured to cause the display to simultaneously display first video corresponding to the first video stream in a first portion of the display, second video corresponding to the second video stream in a second portion of the display, and third video corresponding to the third video stream in a third portion of the display and to output first audio corresponding to the first video stream, wherein the first portion, the second portion, and the third portion of the display are non-overlapping, and wherein the first portion is larger than the second portion;

the frame controller further configured to generate a second frame signal responsive to receiving a swap command, the second frame signal including:

a fourth subframe signal corresponding to the first video stream of the plurality of video streams;

a fifth subframe signal corresponding to the second video stream

of the plurality of video streams; and
a sixth subframe signal corresponding to the third video stream
of the plurality of video streams; and
the output interface further configured to output the second
frame signal to the display, wherein the second frame
signal is configured to cause the display to simultaneously
display video corresponding to the second video stream in
the first portion of the display, video corresponding to the
first video stream in the second portion of the display, and
video corresponding to the third video stream in the third
portion of the display and to output second audio
corresponding to the second video stream.

75. Defendant infringes at least claim 1 of the '681 Patent.

76. The Accused Product is a device that includes an input interface configured to receive a plurality of video streams and to provide the plurality of video streams to a frame controller, wherein each video stream of the plurality of video streams corresponds to a video channel of a plurality of video channels.

77. The Accused Product includes a frame controller configured to generate a first frame signal including

78. The first frame includes a first subframe signal corresponding to a first video stream of the plurality of video streams.

79. The first frame includes a second subframe signal corresponding to a second video stream of the plurality of video streams.

80. The first frame includes a third subframe signal corresponding to a third video stream of the plurality of video streams.

81. The Accused Product includes an output interface configured to output the first frame signal to a display.

82. The first frame signal is configured to cause the display to simultaneously display first video corresponding to the first video stream in a first portion of the display, second video corresponding to the second video stream in a second portion of the display, and third video corresponding to the third video stream in a third portion of the display and to output first audio corresponding to the first video stream.

83. The first portion, the second portion, and the third portion of the display are non-overlapping, and the first portion is larger than the second portion.

84. The frame controller is configured to generate a second frame signal responsive to receiving a swap command.

85. The second frame signal includes a fourth subframe signal corresponding to the first video stream of the plurality of video streams, a fifth subframe signal corresponding to the second video stream of the plurality of video streams, and a sixth subframe signal corresponding to the third video stream of the plurality of video streams.

86. The Accused Product includes an output interface that is configured to output the second frame signal to the display.

87. The second frame signal is configured to cause the display to simultaneously display video corresponding to the second video stream in the first portion of the display, video corresponding to the first video stream in the second portion of the display, and video corresponding to the third video stream in the third portion of the display and to output second audio corresponding to the second video stream.

88. InnoBrilliance has been damaged by Defendant's infringing activities.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the Court enter judgment against Defendant:

1. declaring that the Defendant has infringed the '010, the '299, the '619, the '902, and the '681 Patents;
2. awarding Plaintiff its damages suffered as a result of Defendant's infringement of the '010, the '299, the '619, the '902, and the '681 Patents;
3. awarding Plaintiff its costs, attorneys' fees, expenses, and interest; and
4. granting Plaintiff such further relief as the Court finds appropriate.

JURY DEMAND

Plaintiff demands trial by jury, Under Fed. R. Civ. P. 38.

Dated: January 29, 2021

Respectfully submitted,

/s/ *Raymond W. Mort, III*

Raymond W. Mort, III

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ATTORNEYS FOR PLAINTIFF